

Exhibit D

Budget and Staffing Plan

Exhibit D-1

Budget Plan for the Compensation Period¹

¹ The total fees sought in this Application exceeded the total budgeted fees for the time period, however, by less than 10% (fees sought in the Application are 1.7% above budgeted fees). Proskauer billed more time than expected due to the urgent filing of certain lien challenges against over 260 defendants before the expiry of statutes of limitations barring those challenges. Logistical challenges raised by filing a complaint against this number of defendants combined with the urgent and time sensitive nature of this action required billing more hours than anticipated and is the reason for the higher than budgeted fees.

Matter #	Matter Name	February Estimated Fees	February Actual Fees	March Estimated Fees	March Actual Fees	April Estimated Fees	April Actual Fees	May Estimated Fees	May Actual Fees
33260.0009	PROMESA TITLE III: HTA	\$2,084.61	\$5,931.30	\$8,813.28	\$36,471.60	\$38,801.02	\$69,352.20	\$84,181.61	\$27,132.60
33260.0049	HTA TITLE III – AMBAC	\$64,698.43	\$0.00	\$0.00	\$710.10	\$20,000.00	\$0.00	\$0.00	\$0.00
33260.0050	HTA TITLE III - ASSURED	\$0.00	\$0.00	\$0.00	\$4,260.60	\$20,000.00	\$5,838.60	\$7,087.05	\$2,130.30
33260.0051	HTA TITLE III – PEAJE	\$11,796.08	\$37,083.00	\$55,101.41	\$31,034.70	\$20,000.00	\$2,603.70	\$3,160.44	\$315.60
33260.0053	HTA TITLE III – MISCELLANEOUS	\$603.03		\$0.00	\$236.70	\$251.82	\$0.00	\$0.00	\$0.00
33260.0074	HTA LIEN AVOIDANCE AND SECURED STATUS COMPLAINTS	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$119,166.00
HTA Total		\$79,182.14	\$43,014.30	\$63,914.70	\$72,713.70	\$99,052.84	\$77,794.50	\$94,429.11	\$148,744.50
ESTIMATED FEES Compensation Period (February - May 2019) TOTAL:									\$336,578.78
ACTUAL FEES Compensation Period (February - May 2019) TOTAL:									\$342,267.00
Percent Variance (Actual vs Budgeted Fees)									1.7% above budget

Exhibit D-2

Staffing Plan for the Compensation Period

Staffing Plan for the Compensation Period

Category of Timekeeper²	Number of Timekeepers Expected to Work on The Matter During the Budget Period³	Average Hourly Rate⁴
Partners	14	\$789
Senior Counsel	7	\$789
Associates	9	\$789
e-Discovery Attorneys	5	\$390
Law Clerks	5	\$270
Paraprofessionals	11	\$270

² Attorney Practice Groups: BSGR&B, Litigation, and Corporate.

³ The chart reflects Proskauer's staffing plan for the designated period based on currently foreseeable activities. Actual staffing needs, including additional attorneys, may vary materially based on actual facts and circumstances arising in the designated period, including as a result of currently unanticipated disputes. The staffing plan currently includes attorneys from the Business Solutions, Governance, Restructuring & Bankruptcy Group ("BSGR&B"), Litigation, and Corporate practice groups. The expertise of attorneys from other specialized areas is likely to be required during the course of these PROMESA cases.

⁴ As detailed in the Fifth Interim Application, as of January 1, 2019, Proskauer's rates under the Engagement Letter increased from \$759 per hour for attorneys and \$260 per hour for paraprofessionals to \$789 per hour for attorneys and \$270 per hour for paraprofessionals. Additionally at that time, with the client's knowledge and permission, Proskauer created a new rate class, e-Discovery Attorney, with the rate of \$390 per hour. Rates have not increased during this Compensation Period.